



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

May 18, 2016

CHARLES R. SPIES, TREASURER  
RIGHT TO RISE USA  
6230 WILSHIRE BLVD. PMB 1790  
LOS ANGELES, CA 90048-5126

**Response Due Date**

**06/22/2016**

IDENTIFICATION NUMBER: C00571372

REFERENCE: MARCH MONTHLY REPORT (02/01/2016 - 02/29/2016)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 item(s):

1. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following description(s): "GOTV SERVICES." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at [http://www.fec.gov/law/policy/purposeofdisbursement/inadequate\\_purpose\\_list\\_3507.pdf](http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf).

2. Schedule B supporting Line 21(b) discloses disbursements for "PER DIEM." Please be advised that cash disbursements to any person or vendor for any single purchase or transaction may not exceed \$100. If payments to the original vendor exceed \$200 in a calendar year, a memo entry including the name of the original vendor as well as address, date, amount, and purpose of the original purchase must be provided. Please amend your report to include the missing information or provide clarifying information if memo items are not required. (52 U.S.C. §30102(h)(2) (formerly 2 U.S.C. § 432(h)(2)) and 11 CFR §102.11)

3. The independent expenditure schedule (Schedule E) should disclose the following information: the name and mailing address of the payee, the purpose

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of the expenditure, the date of payment, the amount of payment, the name and office sought, state and district (if applicable) of the federal candidate, the calendar year-to-date, per election, for office sought total, the election designation, an indication of whether the candidate was supported or opposed and the signature of the treasurer. Please amend Schedule E by providing the candidate state. (11 CFR §104.3(b)(3)(vii)). Please be advised that the Commission determined in Advisory Opinion 2003-40 that each State's Presidential primary is considered a separate election for purposes of aggregating independent expenditures.

- Schedule B of your report discloses an expenditure(s) for "COMMUNICATIONS CONSULTING," "POSTAGE" and "PRINTING." For your information and consideration when preparing future filings, if a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) containing express advocacy as defined under 11 CFR §100.22, this would constitute an independent expenditure and would be disclosed on a Schedule E supporting Line 24. Public communications that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate would be reported on Schedule B for Line 21(b) of the Detailed Summary Page.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1143.

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Sincerely,

A handwritten signature in black ink that reads "Kaitlin E. Seufert". The script is cursive and fluid, with the first name "Kaitlin" being more prominent than the last name "Seufert".

Kaitlin Seufert  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division

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